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Sent: Monday, February 27, 2023 2:32 PM
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Cc: Nicholas Kant <Nicholas.Kant@law.njoag.gov>; Rachel Manning <Rachel.Manning@law.njoag.gov>
Subject: [EXTERNAL] RE: ANJRPC/Cheeseman/Ellman (No. 18-10507) -- 3/2 conference and joint discovery plan

I consent.

Best regards,

Brad

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From: Daniel L. Schmutter <DSchmutter@hartmanwinnicki.com>
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All –

As you know, we represent the Plaintiffs in *ANJRPC v. Platkin* and *Ellman v. Platkin*.

We have a conference with Judge Goodman on March 2, 2023. We intend to seek a two week adjournment of the conference. The reason is that the plaintiffs in both cases imminently intend to move for summary judgment or in alternative for a preliminary injunction, and we believe the filing of those motions may materially impact the conference.

Please let me know if you consent to the adjournment.

Thank you.

Dan

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Subject: RE: ANJRPC/Cheeseman/Ellman (No. 18-10507) -- 3/2 conference and joint discovery plan

Good afternoon,

I consent. Given that a schedule was already put into place in Cheeseman prior to consolidation, and given that I think the idea here was to try to align the other cases reasonably closely with that (at least, that is my recollection of the judge's guidance), I was taking a bit of a backseat and waiting to hear from others. Happy to take a look at the proposal once it comes together.

Best regards,

Brad

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Hi Dan S.:

When we spoke yesterday you indicated that plaintiffs wanted to know if the State consented to asking that the 3/2/23 conference with Judge Goodman be adjourned (and, relatedly, that the deadline to submit a joint discovery plan, which I believe would be tomorrow, be adjourned). I said we did consent, and my understanding was that you would loop in co-defendants for their consent as well as make the request to the court.

I'm looping in hopefully all current counsel for the parties for awareness. I don't want to miss the deadline, but I also don't want to have to work to get something finished if the plan is to ask for more time.

Dan

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